

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09500007-2016**
Application Received: **June 3, 2015**
Plant Identification Number: **095-00007**
Permittee: **Dominion Transmission, Inc.**
Facility Name: **Deep Valley Compressor Station**
Mailing Address: **925 White Oaks Blvd., Bridgeport, WV 26330**

Physical Location: Deep Valley, Tyler County, West Virginia
UTM Coordinates: 512.34 km Easting • 4355.01 km Northing • Zone 17
Directions: Travel North West on State Route 18 from West Union. At Deep Valley take Route 56 and then follow approximately 2 miles up Raymond Ridge Road (County Route 56/1) to the site.

Facility Description

Deep Valley Station is a natural gas compressor station used to compress gas for Dominion Transmission, Inc.'s pipeline system in West Virginia. The reciprocating engines at the facility receive natural gas from a valve on a pipeline and compress it to enable further transportation in the pipeline. The facility operates under SIC Code 4922.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Carbon Monoxide (CO)	53.64	33.84
Nitrogen Oxides (NO _x)	324.31	208.67
Particulate Matter (PM _{2.5})	0.92	0.01
Particulate Matter (PM ₁₀)	0.92	0.26

Regulated Pollutants	Potential Emissions	2014 Actual Emissions
Total Particulate Matter (TSP)	0.92	0.26
Sulfur Dioxide (SO ₂)	0.06	0.02
Volatile Organic Compounds (VOC)	102.91	75.35

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2014 Actual Emissions
Acetaldehyde	0.4	0.19
Acrolein	0.4	0.19
Benzene	0.4	0.07
Ethylbenzene	0.7	0.003
Formaldehyde	3.1	1.37
n-Hexane	0.1	0.03
Toluene	1.2	0.10
Xylene	7.5	0.15

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 324.31 tons/year of Nitrogen Oxides (NOx) and 102.91 tons/year of Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, Dominion Transmission, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR2	Opacity Requirements for boilers
45CSR6	Open burning prohibited
45CSR10	Sulfur requirements for fuel burned
45CSR11	Standby plans for emergency episodes
45CSR13	Construction Permits
45CSR16	Emission Standards for New Stationary Sources
WV Code § 22-5-4 (a)(14)	The Secretary can request any pertinent information such as annual emission inventory reporting
45CSR30	Operating permit requirement
45CSR34	Emission Standards for Hazardous Air Pollutants
40 CFR Part 61	Asbestos inspection and removal
40 CFR Part 60, Subpart JJJJ	NSPS for Stationary Spark Ignition Internal Combustion Engines
40 CFR Part 63, Subpart HH	MACT for Oil and Natural Gas Production Facilities

	40 CFR Part 63, Subpart ZZZZ	MACT for Emergency Generators
	40 CFR Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Fugitive PM Control for Materials Handling & Storage

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1104F	August 31, 2015	
G60-C029	February 10, 2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a third renewal. This renewal also incorporates a minor modification submitted as MM01, which reflects the changes to Permit R13-1104E as R13-1104F. The following changes have been made since the last permit revision was issued:

- Updated the Equipment Table by replacing the Dehydration Unit Still and Reboiler, deleting the Flare, and adding thermal oxidizer 2C. Deleted Control Devices S1 and S2 since there are no controls on the emergency generators.
- Old permit conditions 3.1.9., 3.1.10., 3.2.2. and 3.2.3. were moved to Section 5.0. Old condition 3.1.12. was not in the amended R13 permit and 3.2.1. was not included because the amended R13 permit contained new visible emissions monitoring requirements for the thermal oxidizer (2C).
- New conditions 3.1.10. and 3.2.1. were added to incorporate new requirements from R13-1104F.
- Old condition 4.1.2. was moved to the Monitoring Section as 4.2.1.
- The other conditions in Section 4.0 were revised to correspond to the requirements in R13-1104F.
- The conditions of Section 5.0. were revised to correspond to the requirements in R13-1104F.
- Old conditions 5.2.3. through 5.2.8., 5.4.9., 5.4.10., and 5.5.4. were authorized by the CAM plan, however the facility is no longer subject to CAM. See discussion in Non-Applicability Determinations below.
- Section 6.0. was changed to include the requirements from NSPS Subpart JJJJ, replacing the reference to general permit G60-C029, which is still applicable. G60-C requirements have been included as follows: 5.1.1. and 5.1.2. were added as 6.1.1.a. and b.; 5.1.4.a., c., and d. were added as condition 6.2.7.; and 5.4.1. was added as Condition 6.4.3.
- Section 7.0. was updated to include the monitoring and recordkeeping requirements from MACT Subpart ZZZZ.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45 CSR 10 - Compressor engines (EN01 and EN02) have been excluded from the applicability of SO₂ and H₂S limits. WVDEP determined that 45 CSR 10 is not applicable to compressor engines.

40 CFR 60 Subpart JJJJ - The compressor engines (EN01 and EN02) are not subject to this subpart since they were installed in 1989, before the applicability date.

40 CFR 60 Subpart OOOO - This subpart does not apply to the facility since the facility is a gathering facility that does not have tanks constructed, modified, or reconstructed after August 23, 2011.

40 CFR Part 63, Subpart HH - In accordance with 40 CFR §63.760(b)(2), each TEG GDU located at an area source that meets the requirements under 40 CFR §63.760(a)(3) is defined as an affected facility under Subpart HH. However, for a GDU, exemptions to these requirements are given under 40 CFR §63.764(e) if: (1) actual annual average flowrate of natural gas to the GDU is less than 85 thousand standard cubic meters [3 mmscf] per day, or (2) actual average emissions of benzene from the GDU process vent to the atmosphere are less than 0.90 megagram [1 ton] per year. The maximum aggregate PTE of benzene emissions from the GDU process vent is 0.35 tpy, therefore the GDU is exempt from the requirements of 40 CFR §63.764(d).

40 CFR 63 Subpart HHH - This subpart does not apply to the facility since the facility is not a transmission or storage station and is not a major source of HAPs.

40 CFR 63 Subpart DDDDD - The reboiler (RBR01) is not subject to this subpart since it is exempt by 40 CFR §63.7491(h) and the facility is not major source of HAPs.

40 CFR 63 Subpart JJJJJ - The reboiler (RBR01) is not applicable to this subpart since it is considered a "process heater," which is excluded from the definition of "boiler".

40 CFR Part 64 - Compliance Assurance Monitoring. The previous permit addressed CAM as an applicable requirement for DEHY01 for VOCs. DEHY01 has been replaced with DEHY02 with a thermal oxidizer, so the applicability of CAM was reevaluated for this renewal. DEHY02 does not have potential pre-control device emissions of VOCs equal to or greater than 100 tons per year, therefore DEHY02 is not a PSEU for VOCs in accordance with 40 CFR §64.2(a)(3). Also, in accordance with 40 CFR §64.2(b)(1)(i), the facility is not subject to CAM for benzene because the facility is subject to 40 CFR 63 Subpart HH.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Wednesday, April 6, 2016

Ending Date: Friday, May 6, 2016

Point of Contact

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

USEPA commented that Conditions 4.2.1., 4.2.2., and 4.3.1., related to monitoring and testing for visible emissions from the reboiler, are not practically enforceable because there is no required frequency. The reboiler is a 0.275 mmBtu/hr natural gas fired boiler and is therefore not expected to produce visible emissions. The DAQ has the discretion to ask for Method 9 testing if there is a problem, but the DAQ has deemed the large margin of compliance is sufficient to justify not requiring frequent visible emissions testing.

USEPA commented that Condition 5.1.9., related to operation and maintenance of air pollution control equipment, was not practically enforceable because it does not specify steps to take to demonstrate compliance. DAQ responded that Conditions 5.1.6.c., 5.1.6.d., 5.1.6.g., 5.2.2., 5.2.3., 5.4.1., and general R13 requirements 5.4.3. and 5.4.4.. will demonstrate that the Thermal Oxidizer is operated and maintained correctly.

USEPA commented that Condition 5.3.1., related to testing, is not practically enforceable because there is no required frequency. The DAQ retains the discretion to ask for testing, but the required operating limits, monitoring and recordkeeping for the DEHY02 in Conditions 5.1.3., 5.1.4., 5.1.6., 5.1.7., 5.2.1., 5.2.2., 5.2.3., 5.2.4., 5.3.4.b., 5.4.1., 5.4.2., and 5.4.6. were deemed to be sufficient to demonstrate compliance with the emission limits without periodic testing.